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June 21, 2023

Via ECF

Hon. Vernon S. Broderick, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Goidel et al. v. Aetna Life Insurance Co., No. 21-cv-7619

Your Honor:

The parties submit this letter to inform the Court that they are engaged in serious settlement discussions and jointly request a 30-day stay of all deadlines to focus on settlement. Specifically, the parties propose that all current deadlines be stayed and that, on or before July 28, 2023, the parties file a status report updating the Court on the status of the settlement discussions and either (1) requesting an additional stay to continue settlement discussions or (2) proposing a new Case Management Plan and Scheduling Order to reset all briefing and discovery deadlines. The parties further agree that Plaintiffs shall not be prejudiced by this stay, including that Defendant shall not raise any arguments in opposition to class certification that would not have been available to them on June 30, 2023 (the current deadline for the motion for class certification).

The parties respectfully ask the Court to so order this request.

Sincerely,

/s/
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